

1                                   **UNITED STATES DISTRICT COURT**  
2                                   **FOR THE DISTRICT OF NEVADA**

3                   STEVEN R. DAVIS, an individual,  
4                                   Plaintiffs,

5                   vs.

6                   UNITEL VOICE, LLC d/b/a Telecom Management  
7                   Group, Inc.; L3 COMMUNICATIONS, LLC;  
8                   SOMOS, INC. & DOES I-X; and ROE  
9                   CORPORATIONS I-X, inclusive  
   Defendants.

Case No.: 2:18-CV-00673-JCM-PAL

**STIPULATION FOR EXTENSION  
OF TIME TO RESPOND TO  
DEFENDANT SOMOS INC'S  
MOTION TO DISMISS UNDER  
FED. R. CIV. P. 12(b)(5) FILED  
AUGUST 6, 2018.**

**(First Request)**

10                   Plaintiff Steven R. Davis, pro se, and Somos, Inc., through its undersigned counsel  
11 of record, agree that upon the Court's approval, Plaintiff's response to Defendant Somos Inc.'s  
12 Motion to Dismiss, currently due on August 20, 2018, shall be due two weeks from that date, on  
13 September 4, 2018, for the reasons set forth below:

- 14                   1. Defendant Somos, Inc.'s Motion to Dismiss was filed on 8/6/18.
- 15                   2. Plaintiff, via email exchange, requested an Extension to September 4, 2018, to  
16                   file his response.
- 17                   3. Plaintiff is pro se and has limited access to legal resources and needs the  
18                   additional time to craft his response.
- 19                   4. Attorney Irwin Schwartz communicated his assent and advised that Plaintiff  
20                   contact local counsel, Attorney Joseph Ganley, to "work out details".<sup>1</sup>

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24                   <sup>1</sup> Pro Hoc Vice counsel

1           5. Accordingly, Plaintiff and Defendant, Somos Inc. agree that, upon the Court's  
2           approval, Defendant's response to Plaintiff's Motion to Dismiss shall be due on  
3           or before September 4, 2018.

4           6. Furthermore, upon receipt of Plaintiff's response, the Defendant Somos Inc.  
5           shall have seven days to reply.

6           7. This Stipulation has been entered before the Motion is otherwise due.

7           8. Pursuant to Local Rule 6-1, this is Plaintiff and Defendant's first request for an  
8           extension of this deadline.

9           9. The parties seek this extension in good faith and not for purposes of delay.

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10. No party would be prejudiced by the granting of this stipulated motion for an extension of time.

Dated, this the 18<sup>th</sup> day of August 2018, by the undersigned Plaintiff and counsel for Defendant, Somos Inc.

/s/ Steve R. Davis

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/s/ Joseph R. Ganley

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and

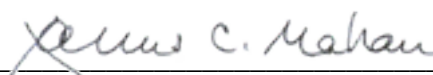
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*Attorneys for defendant Somos, Inc.*

**ORDER**

IT IS SO ORDERED.

Dated: August 21, 2018.

  
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U.S. District Judge